UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GRIDCO INC.
Petitioner

v.

VARENTEC, INC. Patent Owner

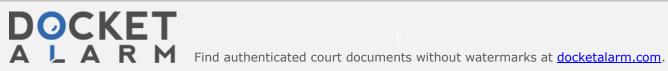
Patent No. 9,293,922
Issue Date: Mar. 22, 2016
Title: Systems And Methods For
Edge Of Network Voltage Control Of A Power Grid

Inter Partes Review No. IPR2017-01134

PETITION FOR *INTER PARTES* REVIEW UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET SEQ*. (CLAIMS 1-3, 8-10, AND 15-16 OF PATENT NO. 9,293,922)



EXHIBIT	LIST	5
I. MAN A. B. C. D.	Real Party-In-Interest	1
II. INTE	R PARTES REVIEW FEE UNDER 37 C.F.R. § 42.103	2
III. CON A. B. C.	TENTS OF PETITION UNDER 37 C.F.R. § 42.104	2
IV. OVE A. B.	RVIEW OF THE '922 PATENT, EXHIBIT 1001 Purported Invention in the '922 patent Independent Claim 1	4
C.	Prosecution History of the '922 patent line	5 5
V. CLAI A. B.	"at or near the edge of the distribution power network"	7 7
VI. TECH A. B. C. D.	HNOLOGY AT ISSUE Power Distribution Networks Voltage regulation on Power Distribution Networks Switched Capacitors Infighting	13 15 17
VII.LEVI	EL OF SKILL AND KNOWLEDGE IN THE ART	18
VIII. UNPATE A.	CLAIM-BY-CLAIM EXPLANATION OF GROUND NTABILITY	18



	3.	D'Aquila provides an explicit reason to look to the Green Board apply its methods	
	4.	Use of the Green Book's time delay method is obvious un	
	⊣.	KSR even absent D'Aquila's explicit teaching	
	5.	Dependent claims 2, 8-10, and 15-16, are likewise unpatenta	
	3.	1	
		in view of the D'Aquila and the Green Book	
		a. Dependent claim 2	
		b. Dependent claim 8	
		c. Dependent claim 9	
		d. Dependent claim 10	
		e. Dependent claim 15	
		f. Dependent claim 16	
B.		und 1B: Dependent claim 3 is obvious in view of D'Aquila and	
		Green Book, further in view of IEEE SVC	
C.	Gro	und 2A: Claims 1-2, 8-10, and 15-16 are obvious in view of the	e
	Gree	en Book and NoMAX	
	1.	Independent claim 1	37
	2.	The combination of Green Book with NoMAX is obvious	as
		merely applying a known technique to solve a previou	ısly
		recognized problem	49
		a. The Green Book recognized the purported problem	lem
		with the prior art systems	
		b. The Green Book also recognized the claimed solut	
		51	
	3.	One of skill would look to NoMAX to provide the details	of
		implementing the known solution and thereby arrive at	
		claimed invention	
	4.	Dependent claims 2, 8-10, and 15-16, are likewise unpatenta	
	•••	in view of the Green Book and NoMAX	
		a. Dependent claim 2	
		b. Dependent claim 8	
		c. Dependent claim 9	
		d. Dependent claim 10	
		e. Dependent claim 15	
		-	
D	Cas	f. Dependent claim 16	
D.		und 2B: Dependent claim 3 is obvious in view of The Green	C O
Г		k and NoMAX and further in view of IEEE SVC	00
E.		und 3A: Claims 1-2, 8-10, and 15-16 are obvious in view of	
	1)'A	auila, further in view of NoMAX	.61



1. Independent claim 1: D'Aquila and NoMAX together teach a	
the elements of claim 16	
2. The combination of D'Aquila and NoMAX is an obviou	1 S
design choice that merely combines prior art elemen	ts
according to known methods to yield predictable results6	6
3. Dependent claims 2, 8-10, and 15-16, are likewise unpatentable	
in view of the D'Aquila and NoMAX6	8
a. Dependent claim 26	8
b. Dependent claim 86	8
c. Dependent claim 96	
d. Dependent claim 107	
e. Dependent claim 157	
f. Dependent claim 16	
F. Ground 3B: Dependent claim 3 is obvious in view of D'Aquila and	
NoMAX, and further in view of IEEE SVC	
NOWAX, and further in view of iEEE 5 v C	1
K. ONE SKILLED IN THE ART WOULD REASONABLY EXPEC	T
UCCESS IN THE PROPOSED COMBINATIONS IN GROUNDS 1-37	2
THERE ARE NO OBJECTIVE INDICIA INDICATING	G
ONOBVIOUSNESS7	4
ONCLUSION7	4

EXHIBIT LIST

Ex. #	Exhibit Name	Identifier
1001	U.S. Patent No. 9,293,922	the '922 patent
1002	Declaration of Dr. Richard E. Brown, P.E.	Brown
1003	U.S. Patent No. 5,402,057 to D'Aquila	D'Aquila
1004	Electric Utility Engineering Reference Book: Volume 3: Distribution Systems	the Green Book or GB
1005	Static Var Compensation Models for Power Flow and Dynamic Performance Simulation, 9 IEEE Transactions on Power Systems 229, 1994	IEEE SVC
1006	NoMAX Instruction manual 900 Series Switched Capacitor Controls ©2007	NoMAX
1007	Declaration of Christopher Butler of Internet Archive regarding NoMAX	Butler
1008	Declaration of Kimberly A. Bengson of HD Electric Company regarding NoMAX	Bengson
1009	District Court Complaint	Complaint
1010	District Court PI memorandum opinion	PI Decision
1011	Joint Proposed Claim Constructions	Proposed CC
1012	Patent Owner Markman Brief	PO Markman
1013	Excerpted File History of U.S. Patent No. 9,014,867 (App. No. 13/488,330)	the '867 file history
1014	Excerpted File History of U.S. Patent No. 9,293,922 (App. No. 14/659,480)	the '922 file history
1015	U.S. Patent No. 9,014,867	the '867 patent
1016		
1017		
1018		
1019		



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